

City of Austin Proposed 2021 Technical Code Changes

MOVE TOGGLE COMMENTS OPTIONS

Engagement Period Statistics (February 1, 2021- March 14, 2021)

All Code Engagements

Filtered by Date

VIEWS	PARTICIPANTS	RESPONSES	COMMENTS
2,647	24	0	57

Uniform Plumbing Code (UPC)

Engagement Period Statistics (February 1, 2021-February 28, 2021)

Project Engagement

Filtered by Date

VIEWS	PARTICIPANTS	RESPONSES	COMMENTS
145	10	0	10

Dear City of Austin DSD,

On behalf of the International Association of Plumbing and Mechanical Officials (IAPMO), thank you for allowing the opportunity to comment on the adoption of the 2021 Uniform Plumbing Code. IAPMO fully supports this effort and offers their assistance in moving forward with the adoption. The Uniform Plumbing Code harmonizes with all building codes and is easier to enforce because there are fewer areas of field interpretation. This in turn helps eliminate conflict between contractors and inspectors that could lead to construction delays and cost overruns. IAPMO respectfully recommends the adoption of the 2021 Uniform Plumbing Code which has served citizens of Austin and the mechanical industry since 1970.

John Mata
Regional Manager-IAPMO
mata@iapmo.org

one month ago

Thank you for your feedback. The Development Services Department will share your comments with the Mechanical and Plumbing Board.

one month ago

Do not adopt this archaic code, please consider adoption of the International Plumbing Code and have just one family of codes for proper correlation.

one month ago

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one month ago

The Real Estate Council of Austin (RECA) is opposed to the proposed adoption of the 2021 Uniform Plumbing Code and 2021 Uniform Mechanical Code. We support the adoption of the 2021 International Codes for other disciplines and request that the City consider adoption of the International Plumbing Code and International Mechanical Code.

The City of Austin continues to be one of only a handful of cities in the state of Texas that still operates under the Uniform Plumbing and Mechanical Codes. In addition, the City of Austin utilizes the International Code Council's family of codes for every other portion of the technical code, including the recently adopted Wildland Urban Interface Code.

The Uniform Plumbing Code and Uniform Mechanical Code are inefficient and incompatible with other International Codes used by the City of Austin. Each time the Uniform Plumbing and Mechanical Codes are adopted, city staff is forced to do hundreds of amendments to make them compatible with the other City adopted codes, and even then, the UPC and UMC are incompatible with some of the city's initiatives like on-site reuse and solar ready zones. Lastly, compliance with the Uniform Plumbing Code is known to be more expensive than the International Plumbing Code. In addition to Austin's existing affordability challenges, the unprecedented severe weather we faced last week has caused major damage to building plumbing systems and will require thousands of plumbing repairs on homes and commercial structures across the area; The use of the UPC will unnecessarily increase the costs of these necessary repairs.

RECA is requesting that the City adopt the International Plumbing and Mechanical codes over the inefficient and costly Uniform Plumbing and Mechanical Codes.

one month ago

Thank you for your feedback. The Development Services Department will share your comments with the Mechanical and Plumbing Board.

one month ago

February 21, 2021

Mayor Steve Adler
City of Austin
301 W. Second St.
Austin, Texas 78701

Dear Mayor Adler,

The Austin Apartment Association (AAA) is a nonprofit trade association chartered in 1964 representing the multifamily and rental housing industry. The AAA is composed of those who own or manage rental property - from a single-family home to condos, to multi-unit apartment communities - as well as those who provide services to the rental housing industry.

The City of Austin is accepting public comment to proposed changes to adopt the 2021 Uniform Plumbing Code (UPC) and Uniform Mechanical Code (UMC). The AAA takes this opportunity express our desire that the City of Austin not adopt the UPC and UMC, but rather take actions to fully adopt and embrace the International Code Council family of codes (I-Codes). ICC codes are carefully developed and regularly updated by a consortium of certified code experts along with design and construction industry representatives including those from the apartment industry.

Austin is one of only seven cities in Texas that does not adopt the International Plumbing Code (IPC), International Mechanical Code (IMC) and International Fuel Gas Code (IFGC). This ongoing situation has led to unneeded administrative and code complexity, as well as the need for multiple technical amendments to the UPC and UMC each time they are scheduled to be adopted.

The time has come to Austin to make the final shift to the I-Codes by adopting the International Plumbing Code and International Mechanical Fuel Gas Code. The movement toward the I-Codes has been going on for many years without issue, and the movement is now a municipal "best practice" that ensures consistency for permit and inspection departments and for those involved in building construction and maintenance operations.

Thank you for considering the full adoption of the of the I-Codes for the City of Austin. All across the nation, and for many years, apartment builders and operators have used the I-Codes and know them to be clearly written and well-coordinated. Fully embracing the I-Codes in Austin will help make the codes less confusing and could lead to permit and inspection efficiencies.

If you have any questions or require additional information from the AAA on this issue contact me at 512-332-2286 or at paul@austinaptassoc.com

Sincerely,

Paul Cauduro, CAE
Director of Government Relations
Austin Apartment Association

one month ago

Thank you for your feedback. The Development Services Department will share your comments with the Mechanical and Plumbing Board.

one month ago

On behalf of the Associated General Contractors (AGC) – Austin Chapter, I am providing this letter in support of the City of Austin's adoption of the International Code Council (ICC) family of codes.

The Austin AGC has been the leading commercial construction association in Travis and surrounding counties for 75 years. A significant part of our mission has been and continues to be to work collaboratively with owners and other members of the A/E/C community to deliver the best structures in the timeliest of manner. It is our belief that the adoption of a single set of codes, codes that have been developed by experts in the various trades, is directly in line with this mission.

It is a privilege to be a part of an industry that has the opportunity to shape and construct the buildings in a region such as ours.

However, along with these opportunities comes a duty: of the contractor to meet the specified safety and functional standards as directed and of the city to have a process that allows the structures to go online as soon as possible. The Austin AGC believes adopting the ICC codes would greatly help the contractor and the City of Austin meet those duties.

Please feel free to reach out to me if you have any questions or would like to discuss further.

Phil Thoden
President and CEO
Austin AGC
philt@agcaustin.org

one month ago

Thank you for your feedback. The Development Services Department will share your comments with the Mechanical and Plumbing Board.

one month ago

Austin, TX public comments on the adoption of the International Plumbing Code® (IPC®) and International Fuel Gas Code® (IFGC®)
February 20th, 2021

I am writing on behalf of the International Code Council (the "Code Council") to provide comments on the City of Austin's proposed 2021 Plumbing Code. My name is Shawn Strausbaugh and I am the Senior Director of PMG Technical Resources with the International Code Council. I am responsible for providing technical support to the Code Council membership in matters related to the I-Codes®. In addition, I am available to the City of Austin, as a technical resource on the codes.

The Code Council is a member-focused non-profit association dedicated to building safety and sustainability and we are proud to count Texas and many of its local jurisdictions, including Austin, as our Governmental Members. The Code Council develops the model building codes, the I-Codes, used in the design, build and compliance process to construct safe, sustainable, affordable and resilient structures. The suite of fifteen I-Codes, including the International Building Code® (IBC®), the International Residential Code® (IRC®), the International Mechanical Code® (IMC®), the International Fire Code® (IFC®), and others, are the most widely used and adopted set of building codes in the U.S. and around the world. Developed through a consensus-based process, the I-Codes incorporate the latest technology and provide the safest, most resilient structures for our families and communities. The International Plumbing Code (IPC) is the preeminent International model plumbing code currently adopted in 37 states across the US. Approx. 250 million people, or half the total US population, live in a state that has adopted the IPC. Furthermore, in the State of Texas at least 500 cities use the IPC, which represents over 80% of the population of Texas. The IPC is also used in Saudi Arabia, the United Arab Emirates, several Caribbean Islands, Columbia (Central America) along with Mexico, which uses the International Residential Code (IRC) and its plumbing provisions.

In reference to the IPC and International Fuel Gas Code (IFGC) there are multiple reasons why the City of Austin should adopt the 2021 IPC and 2021 IFGC in lieu of the 2021 Uniform Plumbing Code which has been proposed. A few important reasons are as follows:

Correlation:

- The I-Codes are all correlated to work together without conflicts to eliminate confusion in building design, plan review and inspections, and provide clarity for contractors constructing buildings including the tradesperson installing the systems within the structure. Current and correlated codes eliminate conflicting or duplicative requirements. This would be of upmost benefit for adoption of the IPC which correlate together to the existing and proposed adoption of the IBC and IRC here in Austin, TX. There are 38 IPC correlated sections in the IBC; 26 in the IMC; 9 in the IFGC; 7 in the IECC and 8 in the IFC; all of which avoids conflict and over lapping requirements. Correlated cross-references impact life safety issues related to:

ISSUES RELATED TO:

- o Accessibility (for persons with disabilities) of buildings, per IBC and the International Code Council A117.1 standard including accessible plumbing fixtures requirements contained which are contained within the 2021 IPC.
- o allowable use of combustibile materials
- o design and installation of roof drainage systems
- o minimum number of required plumbing fixtures
- o fire protection and life safety systems
- o means of egress

- Currently numerous amendments are created in Austin, TX to correlate the current and proposed adoption of the UPC which would not be necessary if the IPC was adopted.

- o Plumbing fixtures

When adopting the IPC, the plumbing fixture calculations will correlate with the IBC plumbing fixture requirements as the IBC plumbing fixture requirements are directly scoped from the IPC, thus not requiring additional extensive amendments. Further the minimum number of plumbing fixtures required under the IPC allows overall fewer plumbing fixtures for numerous occupancy classifications. We will note that assembly occupancy classifications for outdoor stadiums and arenas require a greater number of water closets overall due to loading points during breaks and intermissions were many users are seeking toilet facilities. Further the minimum number of women's water closet is greater under the IPC in some instances to accommodate the difference between male and female use of toilet facilities.

- o Accessibility (usability for persons with disabilities) provisions – IPC 404 and 410

The IBC and the IPC are correlated pertaining to when plumbing fixtures are required to be accessible.

More specifically when drinking fountains, are required, they are to be accessible for both a standing person and a potential wheelchair user. This requirement is clearly provided within the IPC.

The 2021 IPC includes the plumbing related accessibility requirements directly from the ICC A117.1-2017 which provides the user of the IPC direct reference applicable requirements.

- o Fire resistance rated construction – IPC 307.3

Protection of penetrations for fire resistance rated assemblies is acknowledged in the IPC and references the IBC for specific information on the proper installation of plumbing systems within these areas. Thus, protecting and ensuring the fire related safety provisions of the IBC and IPC are correlated and not overlooked.

- o Flood design- IPC 309

Specific plumbing system components are listed in the IPC for structures located in flood hazard areas and correlate with relevant IBC section for further guidance.

- o Hot water supply systems and insulation of piping – 607.5

Insulation of hot water supply systems are given a specific reference to the IECC for all types of buildings.

Flexibility and Options:

- The 2021 IPC now allows design options for providing the minimum number of plumbing fixtures. These design options would allow one or more single user toilet facilities or multiple user toilet facilities to be used by all persons regardless of gender.
- The IPC allows waterless urinals with no restrictions. The UPC allows waterless urinals but requires a water supply piping rough-in to each waterless urinal, which increases construction costs. The waterless urinal is not only is a proven effective water conservation tool, but may also be considered more sanitary, since it is a non-touch plumbing fixture. (424)
- Further along the required plumbing fixture topic, the IPC does not require drinking fountains in restaurants that provide customers with drinking water in a container free of charge. The UPC only allows water stations to be substituted for drinking fountains where food is served indoors however the term "water stations" is undefined in the UPC which may lead to confusion regarding the intent. The IPC requirement provides a clear code path with significant construction cost saving well-beyond the unclear UPC requirements. (410.4)
- System designers or plumbers have a multitude of piping material choices for both drainage waste and vent systems along with water supply systems under the IPC including materials such as Polyolefin Pipe for sanitary systems which is not permitted in the UPC. Ultimately the use specific piping materials within structures is limited by both the building code and the mechanical code such as for use within plenums. Again, these requirements would all be correlated with the adoption of the IPC and IMC and the existing IBC adoption here in Austin. (702)
- The International Plumbing Code allows trenchless technology through pipe bursting for all drainage materials that gives both the code official and plumbers the necessary options for the rehabilitation of an aging building sewer and building drain infrastructure while still being environmentally friendly, "GREEN " by reducing negative impact to property and other infrastructure. The UPC has no pipe

bursting coverage. (716)

- The International Plumbing Code provides a myriad of venting method options for the system designer or plumber to use. These venting methods are not arbitrarily written or restricted as they are under the UPC, rather numerous cost saving venting methods are available options within the IPC.

Illustrated below are a few examples:

- o The IPC includes the option, not mandatory use of air admittance valves (AAV's) as a venting methodology for plumbing systems. These AAV's provide a proven and cost-effective venting method which still requires at least one stack vent or vent stack that extends to the outdoors. Further these AAV's must comply with the respective ASSE standard for the intended use. The use of AAV's in the Detroit Lions Football Stadium resulted in construction cost savings of more than \$263,000.

- o The IPC does not limit the use of a combination waste and vent system in areas of the building where structural conditions preclude the installation of conventional systems as required in the UPC, in section 910. Logically, a venting system either works or it doesn't work, structural provisions of the building itself have no impact on this concept. This is another unjustified burden placed on the designer or plumber which would lead to judgment calls of the code official as to assess whether a "structural condition" existed. (915)

- o Horizontal wet venting for bathroom groups is limited to one-bathroom group, as noted in section 908.2 of the UPC where the IPC allow two-bathroom groups to be served by a horizontal wet vent system. This restriction of the UPC simply limits the design options and increases the cost of construction. (912)

- o Single-stack venting in the UPC is not provided in the body of the code, but rather is listed in Appendix C. It is required to be designed by a registered professional engineer as an engineered design, increasing the cost of construction. The IPC only requires that the single-stack vent system be installed as per the sizing and installation requirements clearly provided within the IPC. (917)

- In addition to the toolbox of venting methods just outlined, vent terminations are permitted to be extended through the side wall of buildings in addition to roofs, under the IPC. This allows greater design and installation choices especially when additions or alterations are made to a plumbing system in an existing building or structure. The UPC only allows vents to terminate through the roof of the structure. (903.6)

- The IPC recognizes several different types of trap seal protection devices including reclaimed or gray water trap seal primer valves and barrier type trap seal protection devices. These additional two types of trap seal protection devices are not recognized in the UPC. (1002.4)

- The IPC has complete sizing requirements for oil interceptors. The UPC states that the AHJ shall determine the size of the interceptor where more than 10 vehicles are service or stored. Further, the IPC does not require the installation of an oil interceptor where vehicle storage is proposed as required in the UPC, but only requires an interceptor where automobiles are serviced, greased, repaired or washed or where gasoline is dispensed. (1003.4.2)

- Siphonic roof drain systems under the UPC must be designed by a registered design professional and additionally comply with the alternative engineered design requirements which creates a significant burden on both the designer and the code official for design review and approval. The IPC allows siphonic roof drain systems that are designed in accordance with ASPE 45 without additional alternative engineered design requirements. (1107)

Cost comparison:

- The International Code Council commissioned a comprehensive independent analysis of plumbing codes to understand the costs and savings associated with building under the IPC in comparison to the UPC.

- o Henderson Engineers found the average new home would save up to \$4,000 in construction costs using the IPC. The savings result in greater home affordability and reduced resources in the construction of the home without sacrificing safety.

- o Over the past 12 years, counties that adopted and applied the IPC rather than the UPC have saved \$38 billion in construction costs, emitted one million fewer ton of carbon dioxide, realized 166,000 additional jobs, and saved 880 million feet of pipe.

Overall, from 2007 to 2018, IPC states and counties realized an estimated 166,000 additional jobs, while UPC states and counties realized 85,000 fewer jobs.

From 2007 and 2018, counties that did not adopt or use the IPC emitted an additional 500,000 tons of CO₂. That is equivalent to taking 100,000 passenger vehicles off the road for one year.

- For complete information visit <https://www.iccsafe.org/advocacy/ipc-tool/>

2021 International Fuel Gas Code

The International Fuel Gas Code (IFGC) is the preeminent International model code currently adopted in 42 states across the US. Approximately 273 million people, or 82% of the total US population, live in areas that have adopted the IFGC. Furthermore, in the State of Texas at least 500 cities use the IFGC, which represents over 80% of the population of Texas.

Correlation:

- There are 33 IFGC correlated sections in the IBC; 9 in the IPC; 24 in the IMC; 5 in the IECC and 57 in the IFC; all of which avoids conflict and over lapping requirements. Correlated cross-references impact life safety issues related to:

- o allowable quantities of hazardous materials
- o detailed ventilation and exhaust requirements based on occupancy and use
- o fire and smoke protection features
- o fire protection and life safety systems
- o means of egress
- The IFGC provides coverage on the installation of gaseous hydrogen systems, while also correlates with Chapters 53 and 58 of the International Fire Code. The UPC contains no coverage of hydrogen systems.
- The IFGC provides guidance for compressed natural gas motor vehicle fuel dispensing facilities while correlating with the IFC. Code correlation is not just about proper numeration of sections. Consideration must be given to the inter-relationship between technical safety provisions.
- The ICC Code Correlation Committees analyze the entire family of codes. The UPC does not go through any such strict scrutiny nor is there a committee that analyzes and compares the safety provisions of other codes in accordance to the International Codes.
- Structural safety is referred to a generic "Building Code" term in the UPC. The structural safety requirements in the IBC are also included in the IFGC which is a huge advantage to the code user.
- Codes that correlate, provide better public safety, better fire prevention, reduce design problems and reduce construction cost.

Flexibility and Options:

- The IFGC allows the installation of gas fired clothes dryers in a residential bathroom or toilet room having a permanent opening of not less than 100 square inches that communicates with a space outside of the sleeping room, bathroom, toilet room, or storage closet. This is an extra safety requirement that the UPC does not provide.
- The IFGC mandates compliance of its heating, ventilating and air-conditioning systems in all structures being designed for efficient utilization of energy in accordance with the IECC as adopted in Austin, TX.
- The IFGC does not allow fuel gas piping to penetrate the foundation walls when the piping is installed below grade. There have been a number of incidents within the United States where fires or explosions have occurred as the result of a fuel gas leak that originates underground and made its way into the building, below grade. The UPC allow underground gas piping penetrations of a foundation wall.

Cost Savings:

- The IFGC allows Schedule 10 steel pipe to be used for fuel gas piping when joints are made using press-connect fittings, flanges, brazing or welding. Other model codes do not allow the use of pipe less than Schedule 40. This results in a significant potential cost savings.
 - Severing the IFGC, or any other code from the family of I-Codes, could cause potential conflicts and technical safety provision lapses that would lead to losses in money, property and most importantly public safety.
 - A code that is not correlated wastes not only staff resources but could cause major conflicts and serious safety concerns upon completion of a project that can lead to substantial cost increase.
- The I-Codes, when adopted as a family of codes, correlating as they do, provide a consistent system of regulations that designers, builders, and regulators can rely on, across city, county or state lines. It is for this reason that FEMA's "Required Minimum Standards" for all FEMA funded construction require the latest I-Codes for post disaster recovery; FEMA requires construction not only meet the latest editions of the IBC, IRC, IECC, and IFC, but also the IPC, IFGC, and IMC.

If the City of Austin were to adopt the IPC, along with the IMC and IFGC, it would be providing its citizens with consistent, coordinated and correlated codes as required by FEMA to qualify for Public Assistance Funds following a natural disaster. Moving forward with the adoption of the UMC and UPC will put Austin citizens at risk of not receiving FEMA assistance in these instances.

To close, you see that there are multiple benefits to adopting the family of I-Codes. By adopting the IPC, IFGC, and IMGC alongside the IBC, IECC, IFC, IRC, IPMC, and ISPSC the potential for public health and safety issues is significantly increased, not only for building owners and tenants but for the system designer and the contractor. Moving forward with the adoption of the UMC and UPC will eliminate these countless benefits. Therefore, we formally request the City of Austin consider the adoption of the 2021 IPC, IFGC, and IMC in lieu of the UMC and UPC. Adoption of the I-Codes, as proposed here, will be a tremendous benefit to the City of Austin, TX and its citizens.

Thank you for the opportunity for the International Code Council to submit our public comments on this extremely important topic. The Code Council is happy to serve as a technical resource to the City of Austin and to follow-up with additional materials or data to aid in the adoption of the 2021 I-Codes including IPC and IFGC. Please feel free to contact me with any questions or concerns.

Sincerely,

Shawn Strausbaugh
 International Code Council, Inc.
 Senior Director of PMG Technical Resources
 Plumbing, Mechanical, Fuel Gas & Swimming Pools (PMG)
 sstrausbaugh@iccsafe.org
 (888).ICC.SAFE, x6242

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 - o Accessibility (for persons with disabilities) of buildings, per IBC and the International Code Council A117.1 standard including accessible plumbing fixtures requirements contained which are contained within the 2021 IPC.
 - o allowable use of combustible materials
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- Further along the required plumbing fixture topic, the IPC does not require drinking fountains in restaurants that provide customers with drinking water in a container free of charge. The UPC only allows water stations to be substituted for drinking fountains where food is served indoors however the term "water stations" is undefined in the UPC which may lead to confusion regarding the intent. The IPC requirement provides a clear code path with significant construction cost saving well-beyond the unclear UPC requirements. (410.4)
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 - o The IPC includes the option, not mandatory use of air admittance valves (AAV's) as a venting methodology for plumbing systems. These AAV's provide a proven and cost-effective venting method which still requires at least one stack vent or vent stack that extends to the outdoors. Further these AAV's must comply with the respective ASSE standard for the intended use. The use of AAV's in the Detroit Lions Football Stadium resulted in construction cost savings of more than \$263,000.
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- In addition to the toolbox of venting methods just outlined, vent terminations are permitted to be extended through the side wall of buildings in addition to roofs, under the IPC. This allows greater design and installation choices especially when additions or alterations are made to a plumbing system in an existing building or structure. The UPC only allows vents to terminate through the roof of the structure. (903.6)

- The IPC recognizes several different types of trap seal protection devices including reclaimed or gray water trap seal primer valves and barrier type trap seal protection devices. These additional two types of trap seal protection devices are not recognized in the UPC. (1002.4)

- The IPC has complete sizing requirements for oil interceptors. The UPC states that the AHJ shall determine the size of the interceptor where more than 10 vehicles are service or stored. Further, the IPC does not require the installation of an oil interceptor where vehicle storage is proposed as required in the UPC, but only requires an interceptor where automobiles are serviced, greased, repaired or washed or where gasoline is dispensed. (1003.4.2)

- Siphonic roof drain systems under the UPC must be designed by a registered design professional and additionally comply with the alternative engineered design requirements which creates a significant burden on both the designer and the code official for design review and approval. The IPC allows siphonic roof drain systems that are designed in accordance with ASPE 45 without additional alternative engineered design requirements. (1107)

Cost comparison:

- The International Code Council commissioned a comprehensive independent analysis of plumbing codes to understand the costs and savings associated with building under the IPC in comparison to the UPC.

- o Henderson Engineers found the average new home would save up to \$4,000 in construction costs using the IPC. The savings result in greater home affordability and reduced resources in the construction of the home without sacrificing safety.

- o Over the past 12 years, counties that adopted and applied the IPC rather than the UPC have saved \$38 billion in construction costs, emitted one million fewer ton of carbon dioxide, realized 166,000 additional jobs, and saved 880 million feet of pipe.

Overall, from 2007 to 2018, IPC states and counties realized an estimated 166,000 additional jobs, while UPC states and counties realized 85,000 fewer jobs.

From 2007 and 2018, counties that did not adopt or use the IPC emitted an additional 500,000 tons of CO2. That is equivalent to taking 100,000 passenger vehicles off the road for one year.

- For complete information visit <https://www.iccsafe.org/advocacy/ipc-tool/>

2021 International Fuel Gas Code

The International Fuel Gas Code (IFGC) is the preeminent International model code currently adopted in 42 states across the US. Approximately 273 million people, or 82% of the total US population, live in areas that have adopted the IFGC. Furthermore, in the State of Texas at least 500 cities use the IFGC, which represents over 80% of the population of Texas.

Correlation:

- There are 33 IFGC correlated sections in the IBC; 9 in the IPC; 24 in the IMC; 5 in the IECC and 57 in the IFC; all of which avoids conflict and over lapping requirements. Correlated cross-references impact life safety issues related to:

- o allowable quantities of hazardous materials

- o detailed ventilation and exhaust requirements based on occupancy and use

- o fire and smoke protection features

- o fire protection and life safety systems

- o means of egress

- The IFGC provides coverage on the installation of gaseous hydrogen systems, while also correlates with Chapters 53 and 58 of the International Fire Code. The UPC contains no coverage of hydrogen systems.

- The IFGC provides guidance for compressed natural gas motor vehicle fuel dispensing facilities while correlating with the IFC. Code correlation is not just about proper numeration of sections.

Consideration must be given to the inter-relationship between technical safety provisions.

- The IFGC Code Correlation Committee analyze the entire family of codes. The IPC does not go

- The ICC Code Correlation Committees analyze the entire family of codes. The UPC does not go through any such strict scrutiny nor is there a committee that analyzes and compares the safety provisions of other codes in accordance to the International Codes.
- Structural safety is referred to a generic "Building Code" term in the UPC. The structural safety requirements in the IBC are also included in the IFGC which is a huge advantage to the code user.
- Codes that correlate, provide better public safety, better fire prevention, reduce design problems and reduce construction cost.

Flexibility and Options:

- The IFGC allows the installation of gas fired clothes dryers in a residential bathroom or toilet room having a permanent opening of not less than 100 square inches that communicates with a space outside of the sleeping room, bathroom, toilet room, or storage closet. This is an extra safety requirement that the UPC does not provide.
- The IFGC mandates compliance of its heating, ventilating and air-conditioning systems in all structures being designed for efficient utilization of energy in accordance with the IECC as adopted in Austin, TX.
- The IFGC does not allow fuel gas piping to penetrate the foundation walls when the piping is installed below grade. There have been a number of incidents within the United States where fires or explosions have occurred as the result of a fuel gas leak that originates underground and made its way into the building, below grade. The UPC allow underground gas piping penetrations of a foundation wall.

Cost Savings:

- The IFGC allows Schedule 10 steel pipe to be used for fuel gas piping when joints are made using press-connect fittings, flanges, brazing or welding. Other model codes do not allow the use of pipe less than Schedule 40. This results in a significant potential cost savings.
 - Severing the IFGC, or any other code from the family of I-Codes, could cause potential conflicts and technical safety provision lapses that would lead to losses in money, property and most importantly public safety.
 - A code that is not correlated wastes not only staff resources but could cause major conflicts and serious safety concerns upon completion of a project that can lead to substantial cost increase.
- The I-Codes, when adopted as a family of codes, correlating as they do, provide a consistent system of regulations that designers, builders, and regulators can rely on, across city, county or state lines. It is for this reason that FEMA's "Required Minimum Standards" for all FEMA funded construction require the latest I-Codes for post disaster recovery; FEMA requires construction not only meet the latest editions of the IBC, IRC, IECC, and IFC, but also the IPC, IFGC, and IMC.

If the City of Austin were to adopt the IPC, along with the IMC and IFGC, it would be providing its citizens with consistent, coordinated and correlated codes as required by FEMA to qualify for Public Assistance Funds following a natural disaster. Moving forward with the adoption of the UMC and UPC will put Austin citizens at risk of not receiving FEMA assistance in these instances.

To close, you see that there are multiple benefits to adopting the family of I-Codes. By adopting the IPC, IFGC, and IMGC alongside the IBC, IECC, IFC, IRC, IPMC, and ISPSC the potential for public health and safety issues is significantly increased, not only for building owners and tenants but for the system designer and the contractor. Moving forward with the adoption of the UMC and UPC will eliminate these countless benefits. Therefore, we formally request the City of Austin consider the adoption of the 2021 IPC, IFGC, and IMC in lieu of the UMC and UPC. Adoption of the I-Codes, as proposed here, will be a tremendous benefit to the City of Austin, TX and its citizens.

Thank you for the opportunity for the International Code Council to submit our public comments on this extremely important topic. The Code Council is happy to serve as a technical resource to the City of Austin and to follow-up with additional materials or data to aid in the adoption of the 2021 I-Codes including IPC and IFGC. Please feel free to contact me with any questions or concerns.

Sincerely,

Shawn Strausbaugh
International Code Council, Inc.
Senior Director of PMG Technical Resources
Plumbing, Mechanical, Fuel Gas & Swimming Pools (PMG)
sstrausbaugh@iccsafe.org
(888).ICC.SAFE, x6242

one month ago

Thank you for your feedback. The Development Services Department will share your comments with the Mechanical and Plumbing Board.

one month ago

I'd like to provide a comment regarding the Proposed UPC 2021 Technical Code Changes.

As the chair of the Austin Water Standards Committee, and given the results of the current and unprecedented winter conditions, I respectfully request that the proposed revisions to Paragraph 606.2.1 (Property owner cut off (POCO)) be pulled; i.e., I request that this paragraph remain as-is with no revisions.

Jeff Kyle
Austin Water Standards Committee Chair

one month ago

Thank you for your comment. The reason for deleting Section 606.2.1 is because the requirements already exist in the published code, with the exception of the clarification of where the full-way valve is to be located. The valve specifications provided in the amendment are not supported by DSD due to limited options, cost increase, and violation of House Bill 2439. The valve specifications also exist in the published code for the installation of a full-way valve on the private side of the meter as does maintenance requirements. Please refer to Section 606.1 General, Section 606.2 Fullway Valve, and Section 102.3 Maintenance, for additional information.

one month ago

If Austin's primary purpose in updating the UPC is to promote safety, but reduce amendments, then the logical choice for Austin is to adopt the International Plumbing Code in lieu of the Uniform Plumbing Code. The Uniform Plumbing Code does not work in coordination with or reference the State mandated International building codes (IBC, IRC, IECC, ISPC) and is developed through an entirely different process by a completely different organization. Moreover, the Uniform Plumbing Code does not coordinate with Austin's currently adopted International Codes which include the International Residential Code, International Building Code, International Fire Code, International Existing Building Code, International Property Maintenance Code, International Swimming Pool and Spa Code and International Energy Conservation Code. How can Austin reduce amendments when numerous technical amendments and skilled expertise are required to safely correlate the UPC to these International Codes? The Uniform Plumbing Code does not work with or reference the International Codes. Safety is at issue, when the City continually tries to push a square peg through a round hole. Technical correlation amendments are necessary and require extensive expertise, and staff time to develop. Moreover, the UPC creates complexity and confusion in the industry when the majority of jurisdictions in Texas and surrounding Austin adopt the International Plumbing Code. In the best interest of practical and safe development as well as cost efficiency in the City, will the Austin please review the benefits of adopting the International Plumbing Code in lieu of the Uniform Plumbing Code? This is a recommendation that has been made multiple times to the City including Recommendation 68 in the Zucker Report and by Staff in 2017. It is time for Austin to make the safest and most efficient choice for its citizens and building and plumbing industry. Adopt the International Plumbing Code. The City still has authority to make local amendments, Moreover, licensed plumbers in Texas are tested on one exam based on both the UPC and IPC so they already have knowledge of the IPC. The International Plumbing Code makes sense for Austin.

one month ago

Thank you for your feedback. The Development Services Department will share your comments with the Mechanical and Plumbing Board.

one month ago

The Building Officials Association of Texas (BOAT) would like to encourage the City of Austin to adopt the International Plumbing and Mechanical Codes. BOAT is dedicated to enhancing the professionalism of its members, advancing the standards of the building industry, and leading in the resolution of public policy issues. We seek to establish higher standards of uniformity and efficiency in administering and enforcing model building codes and related ordinances. Promoting adoption of the ICC codes is consistent with our mission and pursuit of practical use of code knowledge for modern building materials and technology.

It's no surprise that across the nation at most jurisdictional and state levels and at the General Services Administration (GSA) of the United States government, that all of the International Codes are adopted and utilized. The majority of Texas Cities choose the International Codes. BOAT supports and commends these actions. Only the IPC and IMC correlate with other building codes currently adopted by Texas. Contractors and developers value predictability. Our experience has revealed that standardized adoption of the I-Codes helps eliminate confusion in building design and creates consistent code enforcement among all jurisdictions. BOAT encourages the City of Austin to pursue full adoption of all ICC codes as they represent the most up to date building science to construct safe, sustainable, affordable and resilient structures.

Sincerely,

Jeffrey Widmer
President, Building Officials Association of Texas

one month ago

Thank you for your feedback. The Development Services Department will share your comments with the Mechanical and Plumbing Board.

one month ago

would it be possible to add the removal of a commode as an accessible cleanout? in residential or commercial applications?

2 months ago

Staff does not recommend adding the removal of a commode as an accessible cleanout. The intent of the cleanout requirement is to provide access to reach all parts of the horizontal drain system. This may not always be possible through a commode unless specific language was added to make this a requirement. Specific language would impact options for design.

one month ago
